

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION

CHARU DESAI,)
)
Plaintiff,)
)
v.) Civil Action No. 4:19-cv-10520-TSH
)
UNIVERSITY OF MASSACHUSETTS,)
MEMORIAL MEDICAL CENTER, INC.)
UNIVERSITY OF MASSACHUSETTS)
MEMORIAL MEDICAL GROUP,)
UNIVERSITY OF MASSACHUSETTS)
MEDICAL SCHOOL, UMASS MEMORIAL)
HOSPITAL, MAX ROSEN, M.D.,)
DARREN BRENNAN, M.D.,)
STEPHEN TOSI, M.D., KARIN DILL, M.D.)
)
Defendants.)

)

PLAINTIFF'S MOTION FOR ATTORNEY TIMOTHY KOLMAN'S
PRO HAC VICE ADMITTANCE

NOW COMES undersigned counsel, pursuant to Local Rule 83.5.3 for Practice by Persons Not Members of the Bar of the United States District Court for the District of Massachusetts, on behalf of Plaintiff, and respectfully moves for an Order permitting Timothy M. Kolman, Esquire of the office of Kolman Law, P.C., 414 Hulmeville Ave., Penndel, PA 19047, 215-750-3134, Attorney Kolman to be admitted *pro hac vice* as co-counsel for the Plaintiff in the above-captioned matter.

1. As set forth in Attorney Kolman's Certification (attached hereto as "Exhibit A"), Attorney Kolman is not presently admitted to practice in the District of Massachusetts, he has not previously been admitted to practice in the District of Massachusetts *pro hac vice*, he is a member in good standing in all courts in which he is admitted to practice and is not the subject of any disciplinary proceedings in any court in which he is admitted to practice.
2. Movant, Timothy Rodden, Esq., of the Upper Charles Law Group, LLC, 81 Hartwell Ave., Ste. 101, Lexington, MA 02421, is a member in good standing of the bar of the Commonwealth of Massachusetts and this Court, the United States District Court for the District of Massachusetts.

3. Attorney Kolman, by and through undersigned counsel, and in accordance with the local rules of this Court, has made payment for this Court's admission fee with the filing of this Motion.
4. Attorney Kolman, by and through undersigned counsel, respectfully requests this Honorable Court provide Notice of Electronic Filings to Timothy Kolman at the following email addresses: TKolman@KolmanLaw.com and Kolman-Federal@KolmanLaw.com.

**CERTIFICATE OF GOOD FAITH PURSUANT TO
LOCAL RULE 7.1(a)(2)**

5. Undersigned counsel discussed this Motion to Admit Pro Hac Vice with counsel for Plaintiff, Dr. Charu Desai on February 24, 2022, and Plaintiff advised that she wished to have Attorney Timothy Kolman represent her in her case at Civil Action No. 19-10520-TSH and represent her.

WHEREFORE, for the reasons set forth above, undersigned respectfully moves this Honorable Court to enter an Order permitting Attorney Kolman of Kolman Law, P.C. to appear before this Court on behalf of Plaintiff, Dr. Charu Desai, for all purposes related to these proceedings and to direct the Clerk to provide notice of electronic filings to Attorney Timothy Kolman consistent with the request made herein.

Respectfully submitted, Plaintiff,

CHARU DESAI,

By her attorney:

/s/Timothy D. Rodden Jr.

Timothy D. Rodden, Jr., Esq.
BBO#: 691228
The Upper Charles Law Group, LLC
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Lexington, MA 02421
Ph: (617) 600-7170
Email: trodden@uclawgroup.com

Dated: March 22, 2022

Certificate of Service

I, Timothy D. Rodden Jr., counsel for the Plaintiff, hereby certify that I have this day, March 22, 2022, served the foregoing document upon all parties, by electronically filing to all ECF registered parties, and by sending a copy, first class mail, postage prepaid to all unregistered parties.

/s/ Timothy D. Rodden Jr.
Timothy D. Rodden Jr.